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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON MICHAEL SHAMO,

Defendant.

Case No. 2:16-cr-00631-DAK

STIPULATED SUMMARY OF SECOND  
SUPERSEDING INDICTMENT

Judge Dale A. Kimball

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COMES NOW the United States of America, by and through counsel, Kent A. Burggraaf, Special Assistant United States Attorney, and submits the following summary of the Second Superseding Indictment. As previously ordered by the Court, the counsel for the United States and for the Defendant, Aaron Shamo, have conferred regarding the contents of this summary and stipulate to the Court using this summary at the beginning of trial in this matter, in lieu of a full reading of the Second Superseding Indictment.

**Summary of Second Superseding Indictment**

1. A federal grand jury in the District of Utah charged the Defendant, Aaron Shamo, with the following offenses against the United States:

2. Count 1 alleges that beginning on a date unknown, but at least between July 8, 2015 and November 22, 2016, in Utah and elsewhere, the Defendant, Aaron Shamo, engaged in a continuing criminal enterprise in violation of federal law.

3. Specifically, Count 1 alleges that the Defendant, Aaron Shamo, acting in concert with at least 5 other persons with respect to whom he occupied a position of organizer, supervisor, or manager, committed a continuing series of violations of the Controlled Substances Act, including the aiding, abetting, attempting, or conspiring to import, manufacture, distribute, and possess with intent to distribute, fentanyl and alprazolam, using the U.S. Mail in furtherance of these offenses. From such continuing series of violations, the Defendant obtained substantial income and resources.

4. Count 1 also alleges that the Defendant, Aaron Shamo, was a principal administrator, organizer, supervisor, or leader of the criminal enterprise which involved the possession with intent to distribute and the distribution of more than 12,000 grams (12 kilograms) of a mixture or substance containing a detectable amount of Fentanyl.

5. Count 2 alleges that on or about June 23, 2016, in Utah and elsewhere, the Defendant, Aaron Shamo, imported 40 grams or more of a mixture or substance containing the controlled substance Fentanyl into the United States from China.

6. Count 3 alleges that on or about November 8, 2016, in Utah and elsewhere, the Defendant, Aaron Shamo, imported the controlled substance Alprazolam into the United States from China.

7. Count 4 alleges that on or about November 16, 2016, in Utah and elsewhere, the Defendant, Aaron Shamo, imported 40 grams or more of a mixture or substance containing the controlled substance fentanyl into the United States from China.

8. Count 5 alleges that on November 22, 2016, in Utah, the Defendant, Aaron Shamo, possessed 400 grams or more of a mixture or substance containing the controlled substance Fentanyl with the intent to distribute that substance to others.

9. Count 6 alleges that between June 6 and June 13, 2016, in Utah and elsewhere, the Defendant, Aaron Shamo, distributed or aided and abetted in the distribution of the controlled substance Fentanyl, and that as a result a man with the initials R.K. died on June 13, 2016.

10. Count 7 alleges that on November 22, 2016, in Utah, the Defendant, Aaron Shamo, manufactured the controlled substance Alprazolam, by pressing it with other fillers into consumable pills.

11. Count 8 alleges that beginning on a date unknown, but at least between February 3 and November 22, 2016, in Utah, the Defendant, Aaron Shamo, held adulterated drugs for sale in that he manufactured pills to have the appearance of Oxycodone (bearing the markings “A 215”), but which contained the controlled substance Fentanyl and not Oxycodone, and the adulteration had a reasonable probability of causing serious adverse health consequences or death to humans.

12. Count 9 alleges that beginning on a date unknown, but at least between June 18 and November 22, 2016, in Utah, the Defendant, Aaron Shamo, held adulterated drugs for sale in that he manufactured pills to have the appearance of Oxycodone (bearing the markings “M” and “30”), but which contained the controlled substance Fentanyl and not Oxycodone, and the adulteration had a reasonable probability of causing serious adverse health consequences or death to humans.

13. Count 10 alleges that between September 12 and September 23, 2016, in Utah, the Defendant, Aaron Shamo, used, or aided and abetted in the use of the United States Mail in furtherance of a drug trafficking offense to facilitate the distribution of the controlled substance Alprazolam.

14. Count 11 alleges that beginning on a date unknown, but at least between December 22, 2015 and November 22, 2016, in Utah and elsewhere, the Defendant, Aaron Shamo, conspired with others to commit money laundering offenses.

15. Count 12 alleges that on or about November 8, 2016, in Utah, the Defendant, Aaron Shamo, engaged in money laundering by promotion and concealment by depositing \$2,700.00 into a credit union account which involved the known proceeds of the distribution of a controlled substance with the intent to carry on that distribution activity or knowing the transaction was to conceal the nature of the proceeds.

16. Count 13 alleges that on or about May 5, 2016, in Utah, the Defendant, Aaron Shamo, engaged or attempted to engage in a monetary transaction in criminally derived property of a value greater than \$10,000.00 by issuing a personal check from a Wells Fargo bank account to iDrive Utah.

Respectfully submitted this 29<sup>th</sup> day of July, 2019.

JOHN W. HUBER  
United States Attorney

/s/ Kent A. Burggraaf  
KENT A. BURGGRAAF  
Special Assistant United States Attorney